



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Authorization to Proceed with Remedial Investigation/
Feasibility Study at the Johns-Manville site,
Waukegan, Illinois--ACTION MEMORANDUM

FROM: Gene A. Lucero, Director *Gene A. Lucero*
Office of Waste Programs Enforcement

TO: Lee M. Thomas
Assistant Administrator

PURPOSE

This Action Memorandum request authorization to conduct a Remedial Investigation/Feasibility Study (RI/FS) addressing alternative source control and/or off-site remedial actions at the Johns-Manville site. The Illinois Environmental Protection Agency concurs in this action and will make an assurance to provide the Operation and Maintenance, if required, when the project goes to construction.

BACKGROUND

This site is on the National Priorities List.

The Johns-Manville plant produces and has produced a wide range of building materials composed of a variety of substances. During 1922 to 1923, it made low-temperature pipe coverings, packing, insulating cements, roofing products, asbestos and rag felt papers, and magnesia and asbestos shingles. Since 1923, the plant has also produced asphalt floor tile, roofing felts, Sanacoustic tile, asbestos-cement pipe, cut gaskets, siding shingles, flexboard, wallboard, clapboard, rock wool, and glass fiber shingles. Hazardous wastes generated during production of the various materials includes, but may not be limited to, asbestos chrome, lead, xylene, and thiram.

Almost all of the wastes generated since 1922 have been disposed of on-site. There are currently four general waste disposal areas: the friable asbestos disposal pit, the scrap disposal area, the wet waste basin system, and the sludge disposal area. The scrap disposal area is where loose and baled scrap products are dumped in the open. The wet waste basin system consists of a series of settling basins that are not lined or sealed. The sludge disposal area is a dry depression where dredge spoils from the wet waste basins are discharged. Some combustible waste materials were incinerated between 1967 and 1971.

Nearly 600,000 tons of asbestos waste have been disposed at the Johns-Manville plant site. Other hazardous wastes disposed include chromium, lead, xylene, and thiram.

Two air monitoring surveys have previously been conducted at the Johns-Manville site during 1973 and 1982 which have shown releases of asbestos to the air. Little or no data is available regarding potential releases to the surface or ground waters.

Approximately 247 people live within one mile of the facility. Exposure to airborne asbestos fibers has been shown to cause bronchial carcinoma, mesothelioma, and gastrointestinal tract cancers. The extent of potential exposure or risk to those living in proximity to the site cannot be estimated until a detailed RI/FS is performed.

ENFORCEMENT-- See Attachment

PROPOSED PROJECT

The remedial investigation will include groundwater monitoring, well installation, soil sampling, and additional air quality sampling and analysis. An endangerment assessment will be prepared documenting the hazard potential of the site.

The feasibility study will include an analysis of a limited number of alternatives for either source control or off-site remedial actions or both. Detailed analysis after screening shall include cost estimates with distribution over time, evaluation in terms of constructability with emphasis on use of established technology, and impact on public health, welfare and the environment relative to the other alternatives analyzed.

The details of the proposed project are contained in a Remedial Action Master Plan (RAMP) prepared for the Johns-Manville site.

The projected project costs are as follows:

Remedial Investigation	\$322,000
Feasibility Study	42,000
Total RI/FS	<u>\$364,000</u>

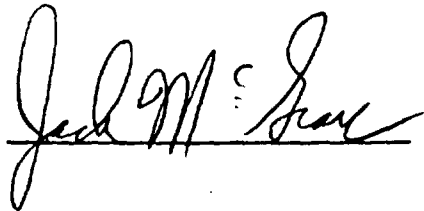
The RI/FS is expected to take 12 months to complete.

There is no cost share by the State required for this RI/FS.

RECOMMENDATION

This request has been coordinated with the appropriate Regional and Headquarters offices. I recommend that you authorize the RI/FS at the John-Manville site.

Approve



Disapprove

Date

9-15-83

Attachment

ENFORCEMENT--CONFIDENTIAL

There is no ongoing State or Federal enforcement. Manville Sales Corporation is the only known potentially responsible party. Although Johns-Manville has filed for bankruptcy under the Federal rules, the company has adequate finances to undertake any required remedial action at the site. The State and Region has identified the Johns-Manville site as a candidate for enforcement action pending completion of an RI/FS. The Regional Counsel concurs in this action. The RI/FS will be a Federal enforcement lead with input from the State.